



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

June 10, 2020

**BY ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Daisy Confesor et al.*, 20 Cr. 59 (VSB)

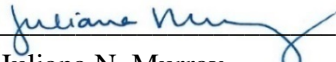
Dear Judge Broderick:

The Government respectfully submits this letter on behalf of all parties to jointly request an adjournment of at least 60 days of the pretrial conference presently scheduled for June 26, 2020, at 2:30 p.m. This is the parties' second request for an adjournment. The parties also respectfully request that the Court adjourn the June 15, 2020 joint status letter deadline accordingly. (Dkt. 42.) The parties request these adjournments in light of the advice given by the Centers for Disease Control and Prevention and other public health authorities to take precautions to reduce the possibility of exposure to COVID-19. In addition, the Government's production of discovery has been delayed by, and the defendants' ability to review discovery produced to date has been hampered by, the COVID-19 pandemic.

The Government respectfully requests that time between June 26, 2020 and the rescheduled pretrial conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government respectfully submits that the proposed exclusion would be in the interest of justice, particularly in light of uncertainty and unforeseen delays resulting from the ongoing COVID-19 pandemic. The Government understands that all defense counsel consent to this request.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

By:   
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Assistant United States Attorney  
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cc: All Counsel of Record (via ECF)

The status conference scheduled for June 26, 2020 is hereby adjourned to August 28, 2020 at 10:00 a.m. The parties shall provide us with a status update in the case on or before August 18, 2020, including whether or not any motions will be filed. The Court advises the parties that additional adjournments will not be granted without a detailed description of (1) the discovery produced; (2) when each item of discovery was produced; (3) what discovery remains to be produced; (4) whether the defense believes the filing of motions based upon the discovery produced is warranted; and (5) what items in the remaining discovery the defense believes it needs to receive to make a determination of whether pretrial motions are appropriate. The adjournment is necessary in light of the courts standing order in 20-mc-196 (CM). The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between June 26, 2020 and August 28, 2020 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161 (h)(7)(A), in the interest of justice.